

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney

2 HALLIE HOFFMAN (CABN 210020)
3 Chief, Criminal Division

4 RYAN REZAEI (CABN 285133)
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055
6 San Francisco, California 94102-3495
7 Telephone: (415) 436-7534
8 FAX: (415) 436-7234
ryan.rezaei@usdoj.gov

Attorneys for United States of America

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION
12

13 UNITED STATES OF AMERICA,)	CASE NO. 19-CR-655-4 HSG
)	
14 Plaintiff,)	PROTECTIVE ORDER
)	
15 v.)	
)	
16 EDUARDO GUZMAN TORRES,)	
a/k/a "Miguel" a/k/a "Mikey" a/k/a)	
17 "Michael" a/k/a "Ramon Guzman-)	
Jimenez" a/k/a "Fortino" a/k/a "Ramon)	
18 Jimenez" a/k/a "Fabian Cisneros" a/k/a)	
"Hernan Torres Garcia" a/k/a "Potes")	
19 a/k/a "Alex,")	
JUAN DIEGO GALLEGOS-MOYA,)	
20 ERNESTO OCHOA,)	
ALFREDO TAPIA SANDOVAL,)	
21 a/k/a "Fredri Tapia-Sandoval" a/k/a)	
"Fredri,")	
22 MARCOS ALVAREZ CORONA,)	
ANTONIO RAMIREZ-JIMENEZ,)	
23 JUAN CARLOS GUZMAN,)	
a/k/a "Jose Rosa-Perez,")	
24 ANGEL RINCON-MENETA,)	
MARIO LAST NAME UNKNOWN,)	
25 ADILENE RAMIREZ,)	
ERICA LAGUNAS, and)	
26 TERESA GUZMAN-RODRIGUEZ,)	
a/k/a "Mono" a/k/a "Monos,)	
27)	
Defendants.)	
28)	

1 With the agreement of the parties, the Court enters the following Protective Order:

2 The defendant is charged with controlled-substances offenses. Upon receipt of discovery
3 requests, the United States will produce to defense counsel documents and other materials pertaining to
4 the defendants and the charged offenses.

5 The discovery to be provided includes documents or other materials falling into the following
6 categories (collectively, "Protected Information"):

7 1. Sealed court orders authorizing the interception of wire and electronic communications
8 over telephones, and associated documents, as set forth in Attachment A, that contain Personal
9 Identifying Information ("PII") of the defendants and third parties (including without limitation any
10 person's date of birth, social security number, residence or business address, telephone numbers, email
11 addresses, driver's license number, professional license number, family members' names, or criminal
12 histories), as well as information regarding potential targets of investigation;

13 2. Other court filings, including warrants for premises, vehicle trackers, and cell phone
14 location data, and associated documents, as set forth in Attachment B, that contain PII of defendants and
15 third parties; and

16 3. Audio and video recordings involving confidential sources and undercover officers.

17 To ensure that Protected Information is not subject to unauthorized disclosure or misuse,

18 **IT IS HEREBY ORDERED** that, notwithstanding any sealing order, the government may
19 produce the documents in Attachments A and B relating to this investigation as necessary to comply
20 with its discovery obligations.

21 **IT IS FURTHER ORDERED** that the documents listed in Attachment A, as well as audio and
22 video recordings involving confidential sources and undercover officers, shall be produced to defense
23 counsel of record, their investigators, assistants, employees, and any experts retained to assist with
24 preparation of the defense in the captioned case, so long as they have reviewed and agreed to be bound
25 by this Order (collectively, "the defense team"). The defense team may review the documents and
26 recordings with the defendant, but shall not provide the defendant with copies of, or permit the
27 defendant to make copies of, or have unsupervised access to these documents and recordings.

28 **IT IS FURTHER ORDERED** that the documents listed in Attachment B shall be produced to

1 the defendant in addition to the defense team. However, these documents shall not be disseminated or
2 disclosed to anyone other than the defendant and the defense team, except upon the express
3 authorization of this Court.

4 All materials containing Protected Information shall be stamped on their face “PROTECTED
5 INFORMATION – SUBJECT TO PROTECTIVE ORDER.”

6 The government and defense counsel are ordered to work together to ensure that these materials
7 are protected, but that each defendant has as much access to the materials as can be provided consistent
8 with this Court’s order.

9 The defendants and all members of each defense team who receive discovery under this Order
10 shall be provided a copy of this Order along with those materials and shall initial and date the order
11 reflecting their agreement to be bound by it.

12 The materials provided pursuant to this protective order may only be used for the specific
13 purpose of preparing or presenting a defense in this matter, unless specifically authorized by the Court.

14 This Order shall also apply to any copies made of any materials covered by this Order.

15 **IT IS FURTHER ORDERED** that neither a defendant nor any member of the defense team
16 shall provide any discovery material containing Protected Information to any third party (*i.e.*, any person
17 who is not a member of the defense team in this case) or make any public disclosure of the same, other
18 than in a court filing, without the government’s express written permission or further order of this Court.

19 If a party files a pleading that contains or attaches Protected Information subject to this Order,
20 the Protected Information must be redacted from the public filing and filed under seal. The defense
21 team shall comply with Criminal Local Rule 56-1 to ensure that Protected Information is not improperly
22 disclosed.

23 **IT IS FURTHER ORDERED** that defense counsel shall return materials subject to this
24 Protective Order (including any copies) to the United States, or destroy such materials and certify to the
25 United States that they have been destroyed, within 14 days after whichever event occurs last in time:
26 dismissal of all charges against the defendant; defendant’s acquittal; defendant’s sentencing; or the
27 conclusion of any direct appeal. Should the defense team seek to retain copies of any materials subject
28 to this protective order, the defense team may, within the time limits set out in the preceding sentence,

1 request that the government provide copies of such materials with all Protected Information
2 appropriately redacted. Government counsel shall provide such redacted copies within a reasonable
3 time after the defense team's request.

4 The United States shall maintain materials subject to this Protective Order until the period for
5 filing a motion under 28 U.S.C. § 2255 has expired. After the statutory period for filing a motion under
6 28 U.S.C. § 2255 has expired, the United States is free to destroy documents and materials subject to
7 this Order. If defendant is represented by counsel and files a motion pursuant to 28 U.S.C. § 2255, the
8 United States will provide counsel with the documents and materials subject to this Protective Order
9 under the terms of this Order. Defendant's attorney in any motion under 28 U.S.C. § 2255 shall return
10 the documents and materials subject to this Protective Order within 14 days after the district court's
11 ruling on the motion or 14 days after the conclusion of any direct appeal of the district court's order
12 denying the motion, whichever is later.

13 This stipulation is without prejudice to either party applying to the Court to modify the terms of
14 any protective order. This Court shall retain jurisdiction to modify this Order upon motion of either
15 party even after the conclusion of district court proceedings in this case.

16 **IT IS SO STIPULATED.**

DAVID L. ANDERSON
United States Attorney

18
19 Dated: January 16, 2020

_____/s/_____
20 RYAN REZAEI
Assistant United States Attorney

21
22 _____/s/_____
23 ROBERT WAGGENER
Counsel for Defendant Alfredo Tapia Sandoval

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25 **IT IS SO ORDERED.**

26
27 Dated: 1/17/2020

28 HAYWOOD S. GILLIAM, JR.
United States District Judge

1 **ATTACHMENT A**

2 WIRETAP APPLICATIONS, AFFIDAVITS, AND ORDERS

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Docket Number	Warrant/Order Date	Description
19-90702 MISC HSG	8/8/19	TARGET TELEPHONE 1
19-90865 MISC HSG	9/20/19	TARGET TELEPHONES 2 AND 3
19-90895 MISC HSG	9/30/19	TARGET TELEPHONE 4

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ATTACHMENT B

PEN REGISTER APPLICATIONS AND ORDERS

Docket Number	Warrant/Order Date	Description
19-90127 MISC	2/7/19	1 phone
19-90250 MISC	3/18/19	1 phone
19-90384 SK	5/7/19	1 phone
19-90504 MISC LB	6/7/19	1 phone
19-90505 MISC LB	6/7/19	1 phone
19-90519 MISC LB	6/12/19	1 phone
19-90701 MISC EDL	8/7/19	1 phone
19-90701 MISC EDL	8/7/19	1 phone
19-90701 MISC EDL	8/7/19	1 phone
19-90701 MISC EDL	8/7/19	1 phone
19-90701 MISC EDL	8/7/19	1 phone
19-90701 MISC EDL	8/7/19	1 phone
19-90701 MISC EDL	8/7/19	1 phone
19-90724 MISC DMR	8/14/19	1 phone
19-90725 MISC DMR	8/14/19	1 phone
19-90726 MISC DMR	8/14/19	1 phone
19-90756 MISC DMR	8/21/19	1 phone
19-90757 MISC DMR	8/21/19	1 phone
19-90777 MISC DMR	8/26/19	1 phone
19-90810 MISC KAW	9/5/19	1 phone
19-90811 MISC KAW	9/5/19	1 phone
3-19-71544 JCS	9/20/19	1 phone
3-19-71544 JCS	9/20/19	1 phone
19-CR-90919 MISC JSC	10/4/19	1 phone
19-CR-90920 MISC JSC	10/4/19	1 phone
19-CR-90945 MISC DMR	10/11/19	1 phone
19-CR-90990 MISC DMR	10/23/19	1 phone
19-CR-90991 MISC DMR	10/23/19	1 phone
19-CR-90992 MISC DMR	10/23/19	1 phone
19-CR-90993 MISC DMR	10/23/19	1 phone
19-CR-91025 MISC DMR	11/6/19	1 phone

LOCATION DATA FOR CELLULAR TELEPHONES WARRANT APPLICATIONS/ORDERS

Docket Number	Warrant/Order Date	Description
4-19-70436 KAW	3/25/19	1 phone
3-19-70701 SK	5/7/19	1 phone
3-19-70875 LB	6/7/19	1 phone
3-19-70983 TSH	6/27/19	1 phone
3-19-71146 TSH	7/29/19	1 phone
3-19-71260 EDL	8/12/19	1 phone
3-19-71261 EDL	8/12/19	1 phone
3-19-71262 EDL	8/12/19	1 phone
3-19-71263 EDL	8/12/19	1 phone
3-19-71266 EDL	8/12/19	1 phone
3-19-71267 EDL	8/12/19	1 phone
4-19-71299 DMR	8/15/19	1 phone
4-19-71332 DMR	8/21/19	1 phone
4-19-71333 DMR	8/21/19	1 phone
4-19-71364 DMR	8/26/19	1 phone
4-19-71472 KAW	9/5/19	1 phone
4-19-71473 KAW	9/5/19	1 phone
3-19-71544 JSC	9/20/19	3 phones
3-19-71545 JSC	9/20/19	3 phones
4-19-71740 DMR	10/24/19	2 phones
4-19-71742 DMR	10/24/19	1 phone
4-19-71839 DMR	11/6/19	1 phone
4-19-71921 KAW	11/19/19	1 phone

VEHICLE TRACKING WARRANT APPLICATIONS/ORDERS

Docket Number	Warrant/Order Date	Description
3-19-70665 SK	5/1/19	1 vehicle
3-19-70984 TSH	6/27/19	1 vehicle
3-19-71259 EDL	8/12/19	1 vehicle
3-19-71265 EDL	8/12/19	1 vehicle
4-19-71424 DMR	8/30/19	1 vehicle
4-19-71483 KAW	9/6/19	1 vehicle
3-19-71497 JCS	9/11/19	1 vehicle
3-19-71546 JCS	9/20/19	1 vehicle
4-19-71676 DMR	10/11/19	1 vehicle
4-19-71737 DMR	10/24/19	1 vehicle

1 PREMISES AND OTHER SEARCH WARRANT APPLICATIONS/ORDERS

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Docket Number	Warrant/Order Date	Description
4-19-71302 DMR	8/29/19	1 company
4-19-71888 KAW	11/18/19	1 premises
4-19-71889 KAW	11/18/19	1 premises
4-19-71890 KAW	11/18/19	1 premises
4-19-71891 KAW	11/18/19	1 premises
4-19-71892 KAW	11/18/19	1 premises
4-19-71893 KAW	11/18/19	1 premises
4-19-71894 KAW	11/18/19	1 premises
4-19-71895 KAW	11/18/19	1 premises
4-19-71896 KAW	11/18/19	1 premises
4-19-71897 KAW	11/18/19	1 premises
4-19-71898 KAW	11/18/19	1 premises

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11 POLE CAMERAS

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Docket Number	Warrant/Order Date	Description
19-90573 MISC TSH	6/26/19	2 premises

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